

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

JACQUELINE PORTER &)	
WILLIAM PORTER,)	
)	
Plaintiffs,)	CASE NO.
)	
v.)	3:06-CV-373-SRW
)	
KEITH D. PATTERSON;)	
TRAVELERS INDEMNITY)	
INSURANCE COMPANY, et al.,)	
)	
Defendants.)	

DEFENDANT'S RESPONSE TO REQUEST FOR ADMISSIONS

COMES NOW the defendant designated as Travelers Indemnity Insurance Company and in response to the Request for Admissions propounded by the plaintiffs, states as follows:

1. On or about 2 May 2005, Jacqueline Porter and William Porter were involved in an automobile wreck on Crawford Road, a public roadway in Russell County Alabama.

RESPONSE: Admitted.

2. The Circuit Court of Russell County is the correct and proper venue for the present action.

RESPONSE: Denied.

3. Prior to the 2nd day of May 2005, Travelers Insurance Company had issued a policy of insurance including liability and uninsured/underinsured motorist coverage insuring Jacqueline Porter and William Porter and said policy was in full force and effect.

RESPONSE: Denied.

4. At the time of the incident made the basis of Plaintiffs' complaint, Jacqueline Porter and William Porter were insured under the policy of insurance issued by Travelers Insurance Company.

RESPONSE: Denied.

5. Plaintiffs duly notified this defendant of their claims under the applicable insurance policy.

RESPONSE: Admitted.

6. At the time of the incident made the basis of Plaintiffs' complaint, Keith D. Patterson was an uninsured/underinsured motorist.

RESPONSE: Denied.

7. At the time of the incident made the basis of Plaintiffs' complaint, Keith D. Patterson was driving in an uninsured/underinsured vehicle.

RESPONSE: Denied.

/s/ Paige H. Sykes
ASB 4858-K64P
ATTORNEY FOR DEFENDANT,
The Travelers Indemnity Company of
America

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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Respectfully submitted,

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